

Bellcore

© Bell Communications Research

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RECEIVED

FEB 24 1993

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

February 24, 1993

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

Dear Ms. Searcy,

Re: Administration of the North American Number
Plan, CC Docket No. 92-237 (Phase I)

Pursuant to the Commission's Notice of Inquiry in CC Docket No. 92-237, released October 29, 1992, and the order of the Deputy Chief, Common Carrier Bureau released January 8, 1993 that extended the time for reply comments, on behalf of Bell Communications Research, Inc. (Bellcore) as Administrator of the North American Numbering Plan, please find enclosed an original and six copies of its Reply of Bell Communications Research, Inc. (Bellcore) as Administrator of the North American Numbering Plan in the above proceeding.

Please stamp and return one copy to confirm your receipt. Please communicate with me, or with Mr. Joel Ader of our Washington, D. C. offices, should you have any questions concerning this matter.

Sincerely,



Michael S. Slomin

Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of

Administration of the
North American Numbering Plan

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CC Docket No. 92-237
(Phase I)

REPLY OF BELL COMMUNICATIONS RESEARCH, INC. (BELLCORE)
AS ADMINISTRATOR OF THE NORTH AMERICAN NUMBERING PLAN

BELL COMMUNICATIONS RESEARCH, INC.

Michael S. Slomin
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SUMMARY

In its initial comments, Bellcore as administrator of the North American Numbering Plan (NANPA) set forth the fairness and conservation objectives that govern its number administration activities, and that NANPA believes should continue to govern future NANP administration. NANPA emphasized that it has done an effective, impartial and fair job of administering the North American Numbering Plan -- the unified numbering plan for World Zone 1, which includes the United States, Canada, Bermuda and fifteen Caribbean nations -- but expressed the belief that others might similarly be able to do so.

Those who advocate transfer of number administration speculate about potential unfairness but do not document any, as they cannot. The current NANPA has been scrupulously fair. It has consciously conducted its activities in a manner that does not favor any group over others. It has worked in standards bodies, industry forums, trade associations and ad hoc meetings it has convened to seek input from all sectors of the industry and others with interests in numbering, including regulators and users. It has released proposals, sought comment on them and sought to promote consensus among conflicting views.

To be sure, not every number administration decision has satisfied every entity with an interest in numbering. Numbering resources are scarce, and responsible administration involves grant of some requests and denial of others. Also, NANPA utilizes industry consensus processes that may not move as quickly as some may wish. Expressions of

unhappiness with the foregoing are contained in comments filed in this proceeding. They do not, however, support any claims of wrongdoing.

NANPA denies all such claims, and responds specifically to the major categories of incorrect claims: that cellular needs are not being addressed; that NANPA acted improperly in CIC expansion; that NANPA's Long Term Numbering Proposal was prepared without adequate industry input; that NANPA personnel acted improperly in a standards body; that NANPA has not addressed central office code assignments; that needs for numbering for inbound international codes have not been satisfied; and that NANPA has acted improperly with respect to N11 codes. Each of these allegations are shown to be baseless.

Finally, NANPA notes the substantial agreement that an expert oversight body should be created to address policy issues, and perhaps other issues such as liaison with industry bodies and dispute resolution. Although this inquiry proceeding cannot, without further proceedings, result in rules governing such a body, NANPA is prepared to form an expert oversight body as soon as the industry and the Commission endorse such action.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554**

In the Matter of)	
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Administration of the)	CC Docket No. 92-237
North American Numbering Plan)	(Phase I)
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**REPLY OF BELL COMMUNICATIONS RESEARCH, INC. (BELLCORE)
AS ADMINISTRATOR OF THE NORTH AMERICAN NUMBERING PLAN**

Bell Communications Research, Inc. (Bellcore) is pleased to offer these reply comments as administrator of the North American Numbering Plan (NANPA). In its December 28, 1992 Comments and in the two rounds of filings on the petition that led to institution of this inquiry,^{1/} NANPA described the history and status of administration of the North American Numbering Plan --the unified numbering plan for World Zone 1 that includes the United States, Canada, Bermuda and fifteen Caribbean nations -- and the domestic and international concerns that it (or any other administrator) must address in performing number administration.

In its comments, NANPA set forth the fairness and conservation objectives that govern its number administration activities, and that it firmly believes should govern any future NANP administrator (be it the current NANPA or another). NANPA emphasized that it has done an effective, impartial and fair job of administering the numbering plan,

^{1/} Comments of Bell Communications Research, Inc. (Bellcore) as Administrator of the North American Numbering Plan in CC Docket No. 92-237 (Dec. 28, 1992); Comments in DA 92-1307 (Dec. 20, 1991); Reply in DA 92-1307 (Jan. 17, 1992).

but expressed the belief that others might similarly be able to do so.

Those who advocate movement of the number administration function elsewhere speculate about potential unfairness but do not document any, as they cannot. Bellcore as NANPA has been scrupulously fair. That is not to say that every number administration decision has been the one desired by every entity seeking numbering resources. They have not, and some of the resulting dissatisfaction forms the basis for several comments herein.

It is important to appreciate that waste of scarce numbering resources will impose costs on users and service providers in World Zone 1 and worldwide. In the absence of market mechanisms for allocation of scarce numbering resources, responsible number administration must include the ability and responsibility to deny requests for numbers, so as to minimize such costs. When Bellcore as NANPA does so, it normally does this under assignment guidelines that have been discussed in industry forums. However, NANPA has also noted the importance of being able to act in the absence of industry consensus, in recognition that delayed decisions can adversely affect service. In both cases, NANPA has emphasized the availability of the FCC as a forum to resolve any resulting complaints.^{2/} Any other responsible NANP administrator will similarly occasionally dissatisfy entities seeking numbering resources.

The one issue on which there is substantial agreement in the comments is that it is desirable to create an expert oversight body to address policy issues, and perhaps other

^{2/} Significantly, the expressions of unhappiness contained in several comments and addressed in more detail below were not the subject of complaints to the FCC.

issues such as liaison with industry bodies and dispute resolution. Creation of such a body was proposed in NANPA's Long Term Numbering Plan proposal, and has been refined in the recently-released second edition of that proposal to encompass both a United States Steering Committee and World Zone 1 Steering Committee, in recognition that there may be differences between concerns relating to the United States alone and ones that affect World Zone 1 as a whole.^{3/}

If the FCC ultimately concludes that it would be in the public interest for administration of the NANP to be shifted to another entity, Bellcore would work cooperatively to make a transition as efficient and effective as possible. We emphasize that Bellcore receives no benefit from serving as NANPA. Our sole interest is in continued promotion of the objectives we have followed, and believe should continue to be followed, i.e., impartiality, conservation, consensus, leadership, initiative and competence.

ALLEGATIONS OF WRONGDOING ARE UNFOUNDED

With several exceptions addressed specifically below, most of the arguments in favor of transfer of the number administration function are based on speculation that since Bellcore is owned by the Regional Companies, it will somehow favor them, or do

^{3/} The U.S. Steering Committee would be comparable to the Canadian Steering Committee on Numbering established last year at the direction and under the auspices of Canadian regulators. Both the Canadian and U.S. Steering Committees would be expected to participate in the World Zone 1 Steering Committee along with entities from Bermuda and the Caribbean nations.

Cellular Needs. McCaw's allegations that NANPA's processes do not adequately seek cellular carriers' input or address these carriers' concerns are incorrect.^{7/} NANPA actively has sought input from cellular carriers; it has visited McCaw to discuss their specific needs; and it has made presentations to and received input from the Wireless Interconnection Forum (WIF), a group comprised of cellular companies and their trade associations.^{8/}

Edition 2 of the Long Term Numbering Plan proposal, released last month in response to various comments on the first edition, specifically addresses needs both for geographic and non-geographic numbering. And, NANPA has, in the industry forums, supported the cellular companies' position that needs for non-geographic numbering for "terminal mobility" should be accommodated along with non-geographic numbering for "personal mobility."^{9/} It is correct that the industry process for arriving at guidelines for

NANPA. By January 11, 1993 filing in CC Docket No. 88-2, Bellcore stated that there is no substantive basis to the allegations made by Mr. Taylor, who was terminated from Bellcore employment on March 31, 1991. A copy of that filing is attached hereto.

^{7/} McCaw comments at 2-3.

^{8/} Indeed, given that Bellcore's owners are all major providers of cellular services, McCaw's claim that NANPA ignores cellular needs would appear to be inconsistent with their claim the NANPA favors its owners' interests.

^{9/} A non-geographic number for "personal mobility" follows the person as he/she moves around. That person can register a new location at someone else's telephone as well as his/her own. Some PCS proposals envision this. A number for "terminal mobility" enables a specific telephone instrument to be reached using the same telephone number, regardless of where that instrument is located. A cellular telephone that is roaming is a typical example of this.

so unconsciously.^{4/}

Incantations of "inherent conflict of interest" notwithstanding, Bellcore as NANPA has consciously conducted its activities in a manner that does not favor any group over others. It has assiduously avoided favoring its owners or their affiliates over others, or exchange carriers over others. It has assiduously worked in standards bodies, industry forums, trade associations and ad hoc meetings it has convened, to seek input from all sectors of the industry and from others with interests in numbering issues (e.g., regulators, users). It has released proposals, sought comment on them, and sought to promote consensus among conflicting views.

Given that NANPA decisions are public,^{5/} any actual favoritism, as opposed to speculations, would have been the subject of real complaints, and not the type of baseless allegations made herein. In the interest of brevity we only respond to several of the more incorrect allegations below.^{6/}

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- ^{4/} Comments of Cox Enterprises at 2 ("Even if NANP administration does not consciously favor its owners, the views of NANP personnel are inevitably affected by their experiences as employees of Bellcore.")
- ^{5/} As is explained below, certain information that submitters view as competitively sensitive that may be submitted to support number assignments is maintained as proprietary if the submitter so requests. For example, if number assignments must be supported by usage projections, a submitter may not wish its marketing plans made public. But, the resulting NANPA decisions are always public.
- ^{6/} Thus, Bellcore as NANPA specifically denies all allegations of favoritism, discrimination or wrongdoing. Parties have sought to support these allegations either by mischaracterizing NANPA's activities, infra., or by seeking to find any allegations of wrongdoing, no matter how baseless. Allnet and MCI go so far as to reference an unauthorized pleading filed in December with the MFJ Court by a former employee that does not relate in any manner to Bellcore's activities as

assignment of non-geographic numbering resources has not moved as expeditiously as some may have desired, but this has been in part because NANPA sought to have the cellular needs addressed by the industry.^{10/}

CIC Expansion. MCI's allegation that NANPA somehow acted unfairly in delaying CIC expansion and in seeking return of excess complements of carrier identification codes (CICs) is, to say the least, peculiar. The delay was occasioned by a number of factors stated by exchange carriers, including the inability of switch manufacturers to deploy revised switch generics to accommodate CIC expansion earlier than previously planned. This led to efforts to conserve the codes, pending expansion.

Under the applicable assignment guidelines that were the product of industry consensus, entities were entitled to no more than three domestic CICs, and if they acquired more by merger or acquisition, they were to make a good faith effort to return the excess within two years for reassignment. MCI had (and has) one of the largest complement of such "excess" codes -- presently in excess of twenty -- which can make codes unavailable to new entrants if the codes exhaust. NANPA simply advised the Commission of this, and sought Commission action in favor of forcing MCI to live up to its obligations under the guidelines.

^{10/} Thus, MCI's claim that draft assignment guidelines for a non-geographic NPA excluded cellular is incorrect. The guideline was intended to encompass needs for "terminal mobility," a form of non-geographic numbering that cellular would use. In view of the scarcity of NPAs prior to 1995, the industry resisted adoption of non-geographic numbering for existing cellular services, to avoid premature exhaust of the few remaining SACs.

Long Term Numbering Plan Proposal. In an effort to promote efficiency and the ability of the entirety of the industry to plan and to provide a mechanism for the orderly exercise of appropriate regulatory oversight, NANPA took the initiative to develop a Long Term Numbering Plan (LTNP) proposal. It sought input from a broad cross-section of experts and the industry, and synthesized a proposal that it released for discussion and comment. It presented that proposal to more than forty industry organizations and sought their views. More than thirty comments were received on edition 1 of the proposal, and a revised edition was released last month on which comment is now being sought.

It is particularly surprising that entities such as MCI and McCaw are seeking to characterize the foregoing as somehow deficient since they provided inputs to the first edition. MCI argues that industry discussions should have been held prior to writing the first draft, but ignores the fact that it was merely a draft intended to facilitate discussion and comments, and not a final document.^{11/} MCI's claim that edition 1 of the LTNP disproportionately reserved geographic numbering resources for exchange carriers is incorrect, but in any event edition 2 of the LTNP specifically reserves the same number of geographic and non-geographic codes.^{12/}

^{11/} Similarly, the claims of MCI and Cox that interviews were not distributed across the entire industry cannot be reconciled with the fact that more than thirty interviews were held, including respondents from all major segments of the industry, prior to writing the first draft. And, even if their segments had not been included, the document was a draft on which comment was sought, not a final document.

^{12/} Thus, McCaw's claim that edition 1 of the LTNP did not promote number portability has been satisfied in edition 2. Rather than demonstrating anything nefarious, this demonstrates that McCaw's comments on this point were assimilated.

MCI claims that delay associated with receiving and assimilating comments on the LTNP benefits Bellcore's owners, but does not acknowledge the advantages to MCI and to the industry as a whole of the comment process. If MCI were really concerned with delay, it would not be advocating creation of a new "NANP Council" that, according to MCI, would not itself decide policy but rather would facilitate the industry's ability to reach consensus resolutions through a new committee system.^{13/} MCI reveals its expectation that such committees will not operate any more expeditiously than the current consensus processes when it proposes a new expedited process for the FCC to resolve contested issues that the committees do not resolve.^{14/}

Standards. MCI's baseless claim in its comments that NANPA incorrectly declared consensus in T1P1 to continue work on a technical report was subsequently addressed by the T1 Advisory Group, which supported the declaration, and by T1P1 which certified that NANPA had acted properly. Work is continuing on the report.

Central Office Codes. MCI's claim that NANPA has improperly delegated central office code assignments to exchange carriers is incorrect. These code assignments have always been administered locally, long predating location of NANPA at Bellcore.^{15/} While NANPA has an interest in promoting efficient use of the central office codes, since their

^{13/} MCI comments, 19-20.

^{14/} Id., 21.

^{15/} Thus, claims by Teleport about its purported experiences with numbering administration practices in the New York metropolitan area, Teleport comments at 4 note 7, have nothing to do with NANPA.

usage affects exhaust of the NPAs that NANPA administers, it has addressed this by requiring code utilization studies to be submitted periodically, rather than by assuming direct administration.^{16/}

NANPA's first direct involvement in central office code assignment was in response to the Commission's request that NANPA lead an industry effort to develop guidelines to govern this. NANPA has been working assiduously to do so for more than eighteen months, but as the Commission's staff -- which has attended most of the meetings -- is well aware, consensus has been very difficult to obtain.^{17/}

Inbound International Codes. MCI's claim that NANPA proposed an unworkable solution to their need for unique codes for inbound international calls was incorrect when made, and is even more so now.^{18/}

^{16/} Several of the submitters of these code utilization studies have asked that information on utilization of individual codes be maintained proprietary for competitive reasons. NANPA has honored these requests. While Cox apparently views this as undesirable, NANPA would extend a similar privilege to Cox if it wished its information made unavailable to its competitors.

^{17/} NANPA shares McCaw's unhappiness, McCaw comments at 3, that the process has taken longer than anticipated. The original plan called for NANPA to terminate the process at the end of twelve months if consensus had not been reached and for NANPA to complete draft guidelines itself for submission as a proposal to the FCC. The industry -- including McCaw -- asked NANPA to ask the FCC to change this plan to allow the industry to continue its work. Also, as the FCC staff is aware, Cox' claim that NANPA ignored cellular input in preparing drafts or at the meetings is simply incorrect.

^{18/} The underlying problem is that the interexchange carriers' networks are not interconnected, leading to the requests for numbering resources that identify networks. MCI first proposed (in 1988) a separate interchangeable NPA code for each carrier, but this would have inefficiently used such NPA codes. In 1989 NANPA proposed an alternate solution that some interexchange carriers

N11 Codes. Cox' claim that NANPA has been ambivalent about using N11 codes as area codes is correct, but the motives it ascribes to this are not. NANPA has indicated that as a last resort it would be willing to assign N00 or N11 codes as geographic area codes if the supply of traditional codes exhausts prior to January 1, 1995 when the industry is to implement interchangeable NPA codes. Neither NANPA nor the industry favors such use, but all traditional codes have been assigned and nearly two years remain until there is relief. There has been disagreement in the industry whether N00 or N11 codes should be assigned first if the need arises, but it appears that it would be easier and quicker to implement use of N00 codes first.^{19/}

AN ADVISORY BODY SHOULD BE CREATED

There is substantial agreement that an expert oversight body should be created to address policy issues, and perhaps other issues such as liaison with industry bodies and

characterized as unworkable, but they allowed the issue to remain dormant until 1992 when MCI proposed assignment of one N00 code -- in the SAC format -- for this purpose, with the first two digits of the central office codes used to identify the carrier. NANPA concluded that one interchangeable NPA could similarly be used to implement such an approach, while retaining the few remaining SACs for true service access purposes. The industry has convened a working group to prepare the appropriate assignment guidelines to implement this.

^{19/} Cox' claim that they have somehow been unable to access information because their attorney was asked to direct requests relating to the ongoing N11 proceeding to Bellcore counsel is incorrect. Cox's single request for information since then was immediately and fully responded to. Cox does not suggest otherwise, as it cannot do so.

dispute resolution.^{20/ 21/} Although this inquiry cannot, without further proceedings, result in rules governing such a body, NANPA is prepared to form an expert oversight body as soon as the industry and the Commission endorse such action.

Respectfully submitted,

BELL COMMUNICATIONS RESEARCH INC.

by:


Michael S. Slovin

Its Attorney

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February 24, 1993

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- ^{20/} This view is independent of what entity ultimately is to perform the NANPA function, although as several parties acknowledge, an advisory body vitiates concerns about supposed conflict of interest if Bellcore retains the NANPA function.
- ^{21/} The comments use a variety of names for such a body, including Policy Board (Metrocall of Delaware), NANP Council (MCI), Policy Development Committee (AT&T), industry advisory group (GTE), policy making body (Sprint), standing industry advisory forum (BellSouth), advisory board (USTA, Bell Canada, and Cincinnati Bell), board of directors (Ad Hoc and Cox), organization with broad eligibility (ARINC and ATA), Advisory Council (NCTA, Pacific Telesis, Southwestern Bell, Canadian Steering Committee on Numbering, and New York State), Policy Council (Paging Network Inc., McCaw and Telocator), and Steering Committee (Unitel and NANPA), and Policy Group (CTIA).

Bellcore

Ⓐ Bell Communications Research

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JAN 11 '93

FEDERAL COMMUNICATIONS COMMISSION
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Louise L. M. Tucker
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January 11, 1993

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

RE: Ex Parte - CC Docket 88-2

Dear Ms. Searcy:

Bellcore feels compelled to correct any misimpressions created by MCI's unauthorized pleading filed December 17, 1992, in the above-referenced docket. MCI's pleading attached a copy of a Motion to Intervene and Affidavit made by Richard Taylor, a former Bellcore employee, against Bellcore filed improperly with the MFJ Court. There is no substantive basis to the allegations made by Mr. Taylor, who was terminated from Bellcore employment on March 31, 1991.

As quoted in the November 30, 1992 issue of Telecommunications Reports, a Bellcore spokesperson said, "Bellcore has acted lawfully at all times, both as a corporation and through its employees, consistent with all laws and regulations. Bellcore has a comprehensive antitrust compliance program in place. It takes its obligations to comply with the antitrust laws and the MFJ (Modified Final Judgment) very seriously, and its internal practices assure that result."

Moreover, as demonstrated in an Opposition filed by Bell Atlantic in the MFJ Court and supported by the other Bell companies (copy attached), non-parties to the decree must take decree complaints to the Department of Justice for initial review, not the court.

Please include a copy of this notice in the public file associated with CC Docket 88-2.

Sincerely,



Louise L.M. Tucker

Attachment

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

-against-

WESTERN ELECTRIC COMPANY, INC.,
and AMERICAN TELEPHONE AND
TELEGRAPH COMPANY,

Defendants.

Civ. No. 82-0192 (HHG)

**OPPOSITION TO RICHARD
TAYLOR'S MOTION TO INTERVENE**

Richard Taylor has filed "a motion to intervene in the public interest," apparently to complain that Bellcore and the Bell companies have acted anti-competitively. He has also served Bell Atlantic with a "summons," a copy of which is attached, purportedly issued by the Clerk of this Court, requiring Bell Atlantic to respond to his motion.

The Court should deny Mr. Taylor's request.¹ The Court has established procedures under which a non-party who believes that a Bell company has violated the decree must make his complaint to the Department of Justice and ask it to seek enforcement.² As

¹ Counsel for the other Bell companies have authorized the undersigned to state that they also oppose Mr. Taylor's motion.

² *United States v. Western Elec. Co.*, 578 F. Supp. 677, 679-80 (D.D.C. 1983). A non-party may petition the Court directly only if he can show by "an affidavit alleging facts with particularity" that the Department's refusal to enforce the decree was in "bad faith." *Id.*

far as Bell Atlantic can tell, Mr. Taylor has not done so. There is no reason for the Court to deviate from the rules that it has followed since 1983.³

Respectfully submitted,



John M. Goodman (Bar No. 383147)

Attorney for Bell Atlantic

1710 H Street, N.W.
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Dated: December 7, 1992

³ E.g., Memorandum and Order at 2-3 (Feb. 28, 1992); Memorandum and Order (Jan. 15, 1992); Fiat (Mar. 29, 1989), sum. aff'd, No. 89-5127, Order (D.C. Cir. Jan. 30, 1990).

CERTIFICATE OF SERVICE

I, Eileen M. Callahan, certify that a copy of the foregoing **Reply of Bell Communications Research, Inc. (Bellcore) as Administrator of the North American Numbering Plan**, in CC Docket No. 92-237 (Phase I), was served on this 24th day of February, 1993, by First Class United States Mail, postage prepaid, to the following persons:

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